

## **EXHIBIT A**

**Karlan, Matthew M.**

---

**From:** Meghan McCaffrey <[meghanmccaffrey@quinnmanuel.com](mailto:meghanmccaffrey@quinnmanuel.com)>  
**Sent:** Wednesday, August 05, 2015 11:25 AM  
**To:** Liman, Lewis J.; Blackman, Jonathan I.; Morag, Boaz S.; Reents, Scott; Karlan, Matthew M.; Tambay, Esti  
**Cc:** Eric Lytle; Mike Lyle; William Burck; Stephen Hauss; Keith Forst; Jaime Kaplan  
**Subject:** Rio Tinto v. Vale, et al

Counsel,

It has come to our attention that in connection with Vale's efforts to serve its sealed orders for examination on Nigel Brown and Alec Leighton, Mr. Brown informed counsel for Vale that he had been retained by Quinn Emanuel for the issues covered by Vale's requests. We write to clarify Mr. Brown's statement, which is not correct. Quinn Emanuel separately retained Mr. Brown *after* filing the complaint in this action in connection with separate potential investigative work into issues that had arisen in the litigation. Mr. Brown was not retained by Quinn Emanuel (or Weil) for his work at GardaWorld or BTG. With respect to Mr. Brown's work at GardaWorld and BTG, however, Rio Tinto had already asked Mr. Brown to collect all documents responsive to Vale's investigator-related requests and understood that he was doing so. We also have separately forwarded both him and Mr. Leighton the sealed orders that we received from you this week. Rio Tinto's request that Mr. Brown collect these materials was a courtesy for Vale to try to move things along; it is no way an acknowledgment or admission that Mr. Brown's materials are in the custody or control of Rio Tinto. Indeed, neither Mr. Brown nor Mr. Leighton have yet committed to turn anything over to Rio Tinto at this time.

Best,  
Meghan

**Meghan McCaffrey**  
*Associate,*  
**Quinn Emanuel Urquhart & Sullivan, LLP**

777 6th Street, NW, 11th Floor  
Washington, D.C. 20001  
202-538-8177 Direct  
202.538.8000 Main Office Number  
202.538.8100 FAX  
[meghanmccaffrey@quinnmanuel.com](mailto:meghanmccaffrey@quinnmanuel.com)  
[www.quinnmanuel.com](http://www.quinnmanuel.com)

NOTICE: The information contained in this e-mail message is intended only for the personal and confidential use of the recipient(s) named above. This message may be an attorney-client communication and/or work product and as such is privileged and confidential. If the reader of this message is not the intended recipient or agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by e-mail, and delete the original message.